

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

STACY ARNOLD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 19-06137-CV-SJ-BP
CITY OF ST. JOSEPH,	)	
ST. JOSEPH PUBLIC LIBRARY,	)	
OFFICER REBECCA HAILEY (IN HER	)	
PERSONAL AND PROFESSIONAL CAPACITY)	)	
	)	
	)	
Defendants	)	

**NINTH DECLARATION OF STACY ARNOLD**

COMES NOW, Stacy Arnold, upon her own oath and penalty of perjury, and states the following:

1. I am over the age of 18, have personal knowledge of the facts in this declaration, and am competent to testify as to the facts herein
2. I returned to the East Hills Library (“the Library”) for five (5) days in February 2020 to petition.
3. When I drove to the Library, I utilized the navigational services of Google maps.
4. Following the directions on Google maps resulted in my arrival at the Library.
5. I observed that the East Hills Mall and the East Hills Library were two separate physical structures.

6. When standing with my back toward the Library on the sidewalk that is adjacent to it, I observed a single row of parking spaces followed by a vehicular pass through, the mall parking lot and the mall.

7. Barring different cars in the parking lot and changes that result from weather and seasons, my observation of the property was indeed consistent with the images from Google maps that I included with my suggestions supporting my summary judgment motion.

8. Moreover, the images from Google maps depicting the entrance to the Library and the Mall are consistent with my experience and what I saw using Google map services to ensure my arrival at the Library.

9. In February 2020, I bought the clipboards that I used to petition with locally.

10. I bought said clipboards from an Office Depot that was close to the East Hills Library.

11. The address of the Office Depot I purchased my clipboards from was 605 N Belt Hwy, St. Joseph, MO 64506.

12. I drove through the vehicular pass through that separated what appeared to be the Library parking lot from what appeared to be the Mall parking lot in order to arrive at the Office Depot to purchase my clipboards.

13. In February 2020, I also remember going to Joanne's Fabrics & Crafts, 603 N Belt Hwy, St. Joseph, MO 64506.

14. I also arrived at Joanne's Fabrics & Crafts via way of the vehicular pass through in front of the Library. The statue of the girl with a dove was visible from the parking lot at Joanne's Fabrics & Crafts.

15. There were other businesses that were in very close proximity to Office Depot and Joanne's, and, barring seasonal changes and the makeup or cars in the parking lot, my visual observations while driving to and visiting Office Depot and Joanne's were consistent with the images depicted via Google maps which were included in my motion for summary judgment.

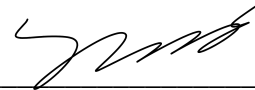
16. I have also observed busses stopping, letting folks off and picking folks up from in front of the Library. However, I do not remember if I made this observation in 2018, 2020, or both years.

17. I remember seeing messages and/or artwork displayed on some of the rocks in the rock garden surrounding the statue. To the best of my recollection, I observed this each time I was there.

18. More pictures of the Library that were taken by me are attached to this reply as Exhibit C.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Further declarant sayeth not.

Executed on December 4, 2020



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Stacy Arnold